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August 12, 2025

Via ECF:

Honorable Diane Gujarati
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Marquez v Indian Taj, Inc d/b/a Santoor Indian Restaurant, et al.
Case No. 20-cv-5855(DG)(RML)

Dear Judge Gujarati:

I represent defendant Harminder Singh (“Harminder”) in the above-referenced matter. I respectfully write to request that Your Honor adopt the Report and Recommendation dated August 11, 2025, issued by Magistrate Judge Robert M. Levy [DE 65].

As detailed in the Report and Recommendation, Magistrate Judge Levy found that the liquor license alone was “insufficient proof” that defendants were owners or officers of Santoor on the date of service and thus granted Harminder and the other defendants’ motions to dismiss the complaint and vacate the default judgements against them. As documented in Harminder’s affidavit and referenced in the Report and Recommendation, Harminder sold his twenty-five percent minority interest on August 21, 2020, and since then had no affiliation with Santoor (Report and Recommendation, pg. 8).

The Magistrate Judge's recommendation includes lifting any restraints or garnishments on Harminder and defendants' bank accounts and ceasing all enforcement efforts against them. Given the clear findings regarding improper service and the time-barred nature of the claims, I respectfully request that Your Honor adopt the Report and Recommendation without delay to provide immediate relief to Harminder along with his wife who is a joint account holder on the bank account that has been restrained by Plaintiff¹.

Thank you for Your Honor's consideration of this urgent matter.

¹ Harminder’s wife had no involvement in the prior ownership of Santoor which makes it even more imperative that the restraint on the account be lifted.

Respectfully submitted,

Bhavleen Sabharwal

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CC: All counsel of record via ECF